

**UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION**

SHARON CURTIS,
via her guardian and conservator,
JANETTE CURTIS,

Plaintiffs,

Case No. 1:23-cv-12859-TLL

vs.

Honorable Thomas L. Ludington
U. S. District Court Judge

DEUTSCHE BANK NATIONAL
TRUST COMPANY, as Trustee for Quest
Trust 2005-X1, Asset Backed Certificates
Series 2005-X1; PHH MORTGAGE
CORPORATION, a foreign limited
liability corp.; OCWEN FINANCIAL
CORPORATION, a foreign limited
liability corp., jointly and severally,

Defendants.

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SUPPLEMENTAL DISCLOSURE UNDER E.D. MICH. L.R. 7.1

NOW COME Defendants Deutsche Bank National Trust Company, as
Trustee for Quest Trust 2005-X1, Asset Backed Certificates Series 2005-X1 (the

“Trustee”), PHH Mortgage Corporation (“PHH”), and Ocwen Financial Corporation (“Ocwen”)(collectively “Defendants”) by and through their attorneys, Dykema Gossett PLLC, and for their Supplemental Disclosure under E.D. Mich. L.R. 7.1 states:

Defendants seek dismissal of this litigation pursuant to Fed. R. Civ. P. 12(b)(1). Defendants’ January 26, 2024 Motion to Dismiss [Dkt. 12] contained a statement in compliance with E.D. Mich. L.R. 7.1(1) providing:

In accordance with E.D. Mich. LR 7.1(a), counsel for Defendants was unable to conduct a conference due to Plaintiff’s counsel’s immediate withdrawal due to disciplinary action of the State Bar of Michigan. Defendants’ counsel did not contact Plaintiffs directly as they have not indicated they will proceed in pro per or by retaining counsel. [Dkt. 12, Pg ID 862.]

As of January 26, 2024, Defendants’ counsel had notice only of the “immediate” suspension of Ms. Moran through the notice submitted to the Clare County Circuit Court. **Ex. A.** However, Plaintiffs’ counsel did not advise this Court of her suspension. On or about February 1, 2024, Defendants’ counsel received notice of the *Order Granting Emergency Motion to Adjourn, Suspending Respondent’s License Pursuant to MCR 9.115(H)(2), Allowing the Filing of A Supplemental Exhibit List and Scheduling Misconduct Hearing*. [Dkt. 14-1.] However, Plaintiffs’ counsel did not advise this Court of her suspension or this Order, and she did not file a formal withdrawal from this case. Again, Plaintiffs’

counsel did not advise this Court of this Order, and she did not file a formal withdrawal from this case.

On February 12, 2024, Defendants' counsel received notice of the February 8, 2024 *Order Vacating Order Suspending Respondent's License Pursuant to MCR 9.115(H)(2)*. [Dkt. 15-1.] On that same date, Defendants' counsel was advised that Plaintiffs' counsel would continue to represent Plaintiffs in this litigation. [Dkt. 15.] On February 15, 2024, Defendants' counsel received a copy of the transcript regarding the January 25, 2024 hearing in which Plaintiffs' counsel was advised she was suspended immediately, although the February 1, 2024 Order did not confirm this ruling. **Ex. B.** Plaintiffs' counsel has never been suspended from the practice of law despite her

On February 16, 2024, Defendants' counsel sought but did not obtain concurrence in the relief sought in the Motion to Dismiss from Plaintiffs' counsel.

Ex. C.

Respectfully submitted,

DYKEMA GOSSETT PLLC

Dated: February 19, 2024

By: /s/ Erin R. Katz

Erin R. Katz (P71604)

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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system.

By: /s/ Erin R. Katz

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